# Missouri Compliance and Enforcement Seminar

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# Expedited Settlement Agreements

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# The GOOD

- Lower Penalty
- Neither admit nor deny allegations
- Voluntary option
- Extension of time available

# The BAD

- Waive Right to Contest
- Waive Hearing
- Certify all violations alleged in the Violations Form

# The UGLY

- Inspection as a “Compliance Opportunity” can be lost
- EPA settlement manager may have only limited experience
- Threat of much higher per day penalties can be a driver

# Expedited Settlements

LINKS

- **112(r) Accidental Release**

  https://www.epa.gov/enforcement/memorandum-use-expedited-settlements-addressing-violations-clean-air-act-caa-chemical

- **311(b) SPCC**

  https://www.epa.gov/enforcement/revised-expedited-settlement-agreement-spill-prevention-control-and-countermeasure-spcc

- **309() Wastewater**

  https://www.epa.gov/sites/production/files/2019-11/documents/esawastewater100319.pdf

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